

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Blackwing Bison Meats, Inc. and
Blackwing Ostrich Meats, Inc.

Plaintiffs,

Case No 08-C-1908

v.

Union of Orthodox Jewish Congregations
of America

Hon. Charles R. Norgle, Sr.

Defendant.

**SECOND MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE PLEAD**

Defendant Union of Orthodox Jewish Congregations of America (the “Orthodox Union”) respectfully requests, pursuant to Federal Rules of Civil Procedure Rule 6(b), that this Honorable Court grant it another extension of time to answer or otherwise plead until June 24, 2008. In support of its motion, Orthodox Union states as follows:

1. Plaintiffs filed the complaint in this matter on April 3, 2008.
2. The next day, Plaintiffs requested and Defendant agreed to waive service of process pursuant to Rule 4, Fed. R. Civ. P. Defendant returned to Plaintiffs, through counsel, an executed Waiver of Service of Summons form in the form provided by this Court on May 1, 2008.
3. Due to the parties' efforts to settle this case, and desire to avoid the expense, delay and inconvenience to the Court associated with unnecessary litigation during such settlement negotiations, the parties sought an extension of time to answer on or about June 3, 2008.

4. The Court granted that motion extending the response time until June 23, 2008.

5. Due to the detailed nature of the dispute, the parties are still attempting to negotiate the final terms of the settlement. As such, the parties are seeking another extension of time, until July 15, 2008, for Defendant to file a responsive pleading.

6. Plaintiffs have consented to an indefinite extension of the response deadline during the settlement negotiations, subject to resetting of a response deadline in the future on two weeks' notice by Plaintiffs in the event that settlement negotiations are unsuccessful. Accordingly, the extension requested herein will not adversely impact the rights of any party.

WHEREFORE, for all of the foregoing reasons, Defendant Orthodox Union respectfully requests that this Court grant them an extension to file their answer or otherwise plead in this matter until July 15, 2008.

DATED: June 20, 2008.

Respectfully submitted,

/s/ Stacey L. Smiricky

One of the Attorneys for Defendant UNION
OF ORTHODOX JEWISH
CONGREGATIONS OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2008, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Harold M. Saalfeld
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_____/s/ Stacey L. Smiricky